

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALLSTATE INSURANCE COMPNAY, ALLSTATE
INDEMNITY COMPANY, DEERBROOK INSURANCE
COMPANY, ALLSTATE NEW JERSEY INSURANCE
COMPANY AND ALLSTATE PROPERTY
CASUALTY INSURANCE COMPANY,

Plaintiffs,

- against-

08-CV-4405 (SLT)(MJP)

**DEFENDANT'S INITIAL
DISCLOSURE RESPONSE
PURSUANT TO
F.R.C.P. 26(a)(1)**

MARK MIRVIS, MARK LUPOLOVER, MICHAEL
BEZENYAN, RUVEN KATZ, IGOR ZHURAVSKY,
GEORGY STATNROSH a/k/a GEORGY STATNIGROSH,
a/k/a GEORGY STATNIGROSH, OCEAN L.
MANAGEMENT GROUP INC., FLATLANDS
BEST MANAGEMENT GROUP, INC., HILLMED
MANAGEMENT, INC. f/k/a 97-12 ASSOCIATES, INC.,
B-WAY MANAGEMENT, INC., FLAT-80
MANAGEMENT, INC., NORTMED MANAGEMENT,
INC., L&B MEDICAL, P.C., LAMED MEDICAL, P.C.,
825 BROADWAY MEDICAL CARE, P.C., DOVER
MEDICAL, P.C., FLATLANDS 78 MEDICAL, P.C.,
GENERAL MEDICAL CARE, P.C., S&L MEDICAL,
P.C., ZDR MEDICAL , P.C., DEL PRADO ONE, LLC,
DEL PRADO TWO, LLC, DEL PRADO THREE, LLC,
DEL PRADO FOUR, LLC, EL DORADO ONE, LLC,
M&M OCEANFRONT, LLC, NE 10, LLC, NE 24, LLC,
TROPICANA ONE, LLC, YAKOV RAUFOV, M.D.,
SOFIA BENTSIA NOV, M.D., EMMA BENJAMIN, M.D.,
AUDREY IVANUSHKIN a/k/a ANDREW INVANSON,
M.D, LEV BENTSIA NOV, M.D., LEONID SLUTSKY,
LYUBOV MOYSIK, M.D., YEFIM SOSONKIN,
GRIGORY SHTENDER, M.D., ALEXANDER ISRAELI,
M.D., MIKHAIL MIRER, M.D., ZHANNA ROIT, M.D.,
RENAT SUKHOV, M.D., HUIKANG DANIEL LAI, M.D.,
JEAN FRANCOIS, M.D., JOHN DOES 1 THROUGH 20,
ABC CORPORATIONS 1 THROUGH 20, AND XYZ
CORPORATIONS 1 THROUGH 20,

Defendants.

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PLEASE TAKE NOTICE, that pursuant to Federal Rules of Civil Procedure § 26(a)(1), defendants Gary Tsirelman, M.D. and Lamed Medical, P.C., by their attorneys Hoffman Polland & Furman, PLLC, for their Initial Disclosure Response, state as follows:

A. [Provide] that name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information[.]

1. Gary Tsirelman, M.D., c/o his attorneys
Mark L. Furman, Esq.
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2. Lamed Medical, P.C., c/o its attorneys
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3. Allstate Insurance Company
4. Co-Defendants Mikhail Mirer, M.D.,
Alexander Israeli, M.D., Andrey Ivanushkin a/k/a Andrew
Ivanson, M.D., Sofia Benstianov, M.D., Grigory Schtender, M.D.,
Lev Bentsianov, M.D., Irena Shperling, M.D. and Zhanna Roit,
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5. Co-Defendant Yakov Raufov, M.D., c/o his attorneys
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6. Co-Defendant Renat Sukhov, M.D., c/o her attorneys
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10. Co-Defendant Dale Alexander a/k/a
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13. Mark Mirvis
14. Mark Lupolover
15. Michael Bezenyan
16. Ruven Katz
17. Igor Zhuravsky

18. Georgy Statnrosh a/k/a Georgy Statnigrosh

19. Leonid Slutsky, M.D.

B. [Provide] a copy of, or a description by category and location, of all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment[.]

1. Patient medical records are a category of documents known to defendants Gary Tsirelman, M.D. and Lamed Medical, P.C., at this time which contain information which they might use to support their claims or defenses.

C. [Provide] a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34, the documents or other evidentiary materials, not privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered[.]

1. Gary Tsirelman, M.D. and Lamed Medical, P.C., are unaware of any categories of damages at this time.

D. [Provide] for inspection and copying, as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. At the present time, Gary Tsirelman, M.D. and Lamed Medical, P.C., are unaware of any insurance agreements that should be disclosed pursuant to Rule 26(a)(1)(A)(iv).

These disclosures may not contain all possibly relevant information and will be periodically supplemented. Moreover, these disclosures are intended to include all relevant witnesses and information that defendants Gary Tsirelman, M.D. and Lamed Medical, P.C.,

may obtain in the course of developing and investigating the claims alleged in this action or the defenses thereto.

Dated: New York, New York
October 19, 2009

Yours, etc.,

HOFFMAN POLLAND & FURMAN PLLC

By. 

MARK L. FURMAN (MLF-4456)

*Attorneys for defendants Gary Tsirelman, M.D. and
Lamed Medical, P.C.*

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